

Judge Frank Montalvo

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

EL PASO DIVISION

FILED  
2011 OCT -5 PM 2:35

CLERK OF DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY:  CLERK

UNITED STATES OF AMERICA

Plaintiff,

vs

ALARCON ALLEN WIGGINS,  
DEANGELO PERRY SMITH,  
aka "D-Lo"  
DEYONTA THOMPSON,  
aka "Wezz Fresh,"  
MARC COREY WILLIAMS,  
aka "DJ Yung Rock," "J-Rock"  
MARTES MILTON JACKSON,  
aka "Tuesday,"  
SHELBY NICOLE SMITH,  
aka "BeBe,"  
ROXANNE MICHELLE MITCHELL,  
aka "Nakira," "Foxy," "Roxy,"  
"Mama," "Cherish"  
AMANDA GAYLE DARBONNE,  
aka "Kristale," "Kristal,"  
HOLLY N. REEMER,  
aka "Amira, and  
BRANDI L. MINNICH,  
aka "Natasha,"

Defendants.

INDICTMENT

Ct 1: 18:2421 - Transportation for  
Prostitution  
Ct 2: 18:2422 - Coercion and Enticement

NOTICE OF FORFEITURE

**EP11CR2420**

THE GRAND JURY CHARGES:

**COUNT 1**  
**(18 U.S.C. § 2421 – Transportation for Purposes of Prostitution)**  
**(18 U.S.C. § 2 - Aiding & Abetting)**

Beginning on or about December 2009 and continuing to present, in the Western District of Texas and elsewhere, defendants

ALARCON ALLEN WIGGINS,  
DEANGELO PERRY SMITH,  
    aka "D-Lo,"  
    DEYONTA THOMPSON,  
        aka "Wezz Fresh,"  
    MARC COREY WILLIAMS,  
    aka "DJ Yung Rock," "J-Rock"  
    MARTES MILTON JACKSON,  
        aka "Tuesday,"  
    SHELBY NICOLE SMITH,  
        aka "BeBe,"  
    ROXANNE MICHELLE MITCHELL,  
    aka "Nakira," "Foxy," "Roxy," "Mama," "Cherish"  
    AMANDA GAYLE DARBONNE,  
        aka "Kristale," "Kristal,"  
    HOLLY N. REEMER,  
        aka "Amira, and  
    BRANDI L. MINNICH,  
        aka "Natasha,"

together with others known and unknown to the Grand Jury, and aided and abetted by each other, did knowingly transport an individuals in interstate commerce with intent that such individual engage in prostitution, in violation of 18 U.S.C. 2421.

**COUNT TWO**  
**(18 U.S.C. § 2421 – Coercion & Enticement)**  
**(18 U.S.C. § 2 - Aiding & Abetting)**

THE GRAND JURY FURTHER CHARGES:

Beginning on or about December 2009 and continuing to present, in the Western District of Texas and elsewhere, defendants

ALARCON ALLEN WIGGINS,  
DEANGELO PERRY SMITH,  
aka "D-Lo,"  
DEYONTA THOMPSON,  
aka "Wezz Fresh,"  
MARC COREY WILLIAMS,  
aka "DJ Yung Rock," "J-Rock"  
MARTES MILTON JACKSON,  
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aka "Nakira," "Foxy," "Roxy," "Mama," "Cherish"  
AMANDA GAYLE DARBONNE,  
aka "Kristale," "Kristal,"  
HOLLY N. REEMER,  
aka "Amira, and  
BRANDI L. MINNICH,  
aka "Natasha,"

together with others known and unknown to the Grand Jury, and aided and abetted by each other, did knowingly persuade, induce, and entice and attempt to persuade, induce and entice, individuals to travel in interstate commerce to engage in prostitution and sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18 United States Code Section 2422(a).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
(18 U.S.C. § 2428)

Upon conviction of one or more of the offenses set forth in Counts Six and Seven of this Indictment, Defendants,

ALARCON ALLEN WIGGINS,  
DEANGELO PERRY SMITH,  
aka "D-Lo,"  
DEYONTA THOMPSON,  
aka "Wezz Fresh,"  
MARC COREY WILLIAMS,  
aka "DJ Yung ROCC," "J-ROCC"  
MARTES MILTON JACKSON,  
aka "Tuesday,"

SHELBY NICOLE SMITH,  
aka "BeBe,"  
ROXANNE MICHELLE MITCHELL,  
aka "Nakira," "Foxy Roxy,"  
AMANDA GAYLE DARBONNE,  
aka "Kristale," "Kristal,"  
HOLLY N. REEMER,  
aka "Amira, and  
BRANDI L. MINNICH,  
aka "Natasha,"

shall forfeit to the United States, pursuant to 18 U.S.C. § 2428, any and all property, real and personal, used or intended to be used to commit or to facilitate the commission of the offenses, and any property, real and personal, constituting or derived from, any proceeds obtained directly or indirectly, as a result of the offenses including but not limited to the following:

1. A sum of money equal to at least approximately \$1,000,000 in United States currency, representing the amount of proceeds obtained as a result of the offenses, for which the defendants are jointly and severally liable.
2. All vehicles, including but not limited to:
  - (1) a 2003 Red Chevrolet Trailblazer, VIN: 1GNDT13S132341368, last known tags: PA Temporary tag: 3234-1368, and
  - (2) a 1998 White Dodge Ram Wagon, VIN: ZB5WB3520WR138523, last known tags: PA Temporary tag: 1822563

**Substitute Assets Provision**

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

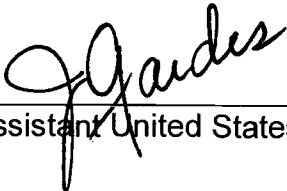
A TRUE BILL

ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

\_\_\_\_\_  
Foreperson

ROBERT PITMAN  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

  
Assistant United States Attorney